

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,

Plaintiff

v.

TIMOTHY CALLAHAN,  
FRANCIS M. ROACHE,  
PAUL MURPHY, RICHARD WALSH,  
and THE CITY OF BOSTON,

Defendant

C.A. NO.: 04-11193NG

MOTION FOR ORDER COMPELLING DISCLOSURE OF  
CRIMINAL OFFENDER RECORD INFORMATION

Pursuant to the Order of the Court, the Defendants hereby move for an Order compelling the disclosure of Plaintiff trial witnesses Lola Alexander, Ricky Evans, Olisa Graham, Betty Peaks, and Tracy Peaks. As grounds therefore, Defendants submit that the foregoing individuals appear on the Plaintiff's list of trial witnesses, and Defendants respectfully request that the CORI order be allowed so as to provide adequate opportunity to access certified copies of conviction, if any, of the aforementioned witnesses.

Respectfully submitted,  
By the Defendant Timothy Callahan  
Through his attorney,

/s/ Mary Jo Harris

Mary Jo Harris  
Morgan, Brown & Joy, LLP  
200 State Street  
Boston, Massachusetts 02109  
Tel.: (617) 523-6666  
BBO# 561484

Respectfully submitted,  
By Defendant Richard Walsh  
Through his attorney,

/s/ Hugh R. Curran

Hugh R. Curran  
Bletzer & Bletzer  
300 Market Street  
Brighton, Massachusetts 02135  
Tel.: (617) 254-8900  
BBO# 402057

Date: March 2, 2008

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v.

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Defendant

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**ORDER FOR CRIMINAL AND PROBATION RECORDS**

Upon leave of Court, access is granted to counsel for the Defendants, Mary Jo Harris, Morgan, Brown & Joy, LLP, 200 State Street Boston, MA 02109 (for Defendant Callahan); Hugh R. Curran, Bletzer & Bletzer, 300 Market Street, Brighton, MA 02135 (for Defendant Walsh); John Roache, Roache & Malone, 66 Long Wharf Boston, MA 02110 (for Defendant City of Boston); and William M. White, Wm. White & Associates, One Faneuil Hall Marketplace, Boston, MA 02109 (for Defendant Callahan), to obtain certified copies of all criminal records, and all documents related thereto, of the individual identified on Exhibit A (attached).

By the Court,

Dated: \_\_\_\_\_, 2008

**EXHIBIT A TO DEFENDANTS' MOTION FOR  
DISCLOSURE OF CRIMINAL OFFENDER RECORD INFORMATION**

1. Alexander, Lola  
SSN 4 [REDACTED]  
DOB [REDACTED]  
Last known address: 4 Theodore Street, Apt. 5  
Dorchester, MA
2. Evans, Ricky  
SSN: [REDACTED]  
DOB: [REDACTED]  
Last known address: 19 Bradlee Street  
Dorchester, MA
3. Graham, Olisa  
SSN: [REDACTED]  
DOB: [REDACTED]  
Last known address: 644 River Street Apt 5  
Mattapan MA
4. Peaks, Betty  
SSN: [REDACTED]  
DOB: [REDACTED]  
Last known address: 67 Woolson Street Apt 2  
Mattapan MA
5. Peaks, Tracie  
SSN: [REDACTED]  
DOB: [REDACTED]  
Last known address: 67 Woolson Street, Apt 2  
Mattapan MA